

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

UBIQUITY, INC.,

Plaintiff,

v.

BRIAN KREBS and KREBS ON
SECURITY, LLC,

Defendants.

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Civil Action No. 1:22-CV-00352-RDA-IDD

**DEFENDANT KREBS ON SECURITY, LLC'S
UNOPPOSED MOTION TO EXTEND TIME**

Pursuant to Local Rule 7, Defendant Krebs on Security, LLC (“Defendant”), by and through undersigned counsel, moves for an extension of time to respond to Plaintiff’s Complaint, which the docket reports was served on Defendant on April 14, 2022, making a response due on or before May 5, 2022. Defendant’s counsel has conferred with Plaintiff’s counsel who indicated that Plaintiff does not oppose Defendant’s request for an extension until June 6, 2022 for Defendant to respond to the Complaint.

Plaintiff and Defendant Krebs on Security (as well as unserved Defendant Brian Krebs) are presently engaged in discussions to potentially resolve the dispute. Under the circumstances and to avoid unnecessary litigation expenses, an extension until June 6, 2022 is reasonable and desirable to all parties, and will not prejudice any party.

Accordingly, Defendant respectfully requests that it be given until and including June 6, 2022, to respond to the Complaint in this case.

NOTICE OF WAIVER OF ORAL ARGUMENT

Defendant waives oral argument with regard to this Unopposed Motion to Extend Time.

Dated: May 5, 2022

Respectfully Submitted,

/s/ David S. Wachen

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Attorneys for Defendant

Krebs On Security, LLC

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CERTIFICATE OF SERVICE

I hereby certify that, on this 5th day of May, 2022, I caused a copy of the foregoing to be filed electronically. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

/s/ David S. Wachen

David S. Wachen (VSB No. 96363)